

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

<b>IN RE: AQUEOUS FILM-FORMING FOAMS PRODUCTS LIABILITY LITIGATION</b>	MDL No. 2:18-mn-2873-RMG  <b>This Document relates to ALL CASES</b>
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**DEFENDANTS' REPLY MEMORANDUM IN SUPPORT OF THEIR MOTION FOR  
PARTIAL SUMMARY JUDGMENT ON THE FIRST ELEMENT OF THE  
GOVERNMENT CONTRACTOR IMMUNITY DEFENSE**

**EXHIBIT LIST**

<b><u>EXHIBIT</u><sup>1</sup></b>	<b><u>DESCRIPTION</u></b>
139	Dept. of Defense Information Paper, NRL Response to 19392C4 – Firefighting Foam Inquiry, Sept. 24, 2014 (PENNA-NAVY-004782)
140	Deposition of John Farley, June 24–25, 2021 (excerpts) <sup>2</sup>
141	NAVSEA Email Correspondence regarding Jennifer Field Report Solberg AFFF's, Jan. 2017 (Navy06-00002881)
142	Jennifer Field, Report on PFS Substances in Solberg Mil-Spec and commercial AFFF's, Jan. 27, 2017 (Navy06-00002882)

<sup>1</sup> Defendants' Exhibit Nos. 1-138 were filed with Defendants' Motion for Partial Summary Judgment on the First Element of the Government Contractor Immunity Defense. (See Dkt. Nos. 1965, 1966, 1967, 1968, 1969, and 1971).

<sup>2</sup> Excerpts of particularly long documents are provided for the Court's convenience; full length copies can be provided on request.